



September 13, 2024

By ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Corsini, et al. v. Dentons US LLP, et al., 1:24-cv-03196

Dear Judge Broderick:

We write on behalf of Boies Schiller Flexner LLP (BSF) which is a defendant in the above-referenced matter.

On July 31, 2024, the Court ordered Plaintiffs to demonstrate good cause as to why the Defendants who had not yet been served in this matter should not be dismissed pursuant to Federal Rule of Civil Procedure 4. By letter dated August 6, Plaintiffs claimed good cause existed for a 35-day extension of the time to serve the unserved individual defendants in this action. The Court subsequently extended the time for Plaintiffs to complete service to September 12, 2024.

Separately, after the Dentons firm and individual defendant Reich had been served and sought an extension of their time to respond to the Complaint, the Court *sue sponte* extended the deadline for a response to the Complaint to September 30, 2024, for all served defendants in order to facilitate consistent deadlines.

To our knowledge based on the certificates of services that are on the docket in this matter, Plaintiffs have still not served a number of individual defendants, nor did they seek a further extension of their time to serve prior to the September 12 deadline. Accordingly, it appears that all unserved individual defendants can be dismissed from the case, leaving the remaining defendants to respond to the Complaint according to the existing deadline of September 30. BSF is prepared to meet that deadline. However, if Plaintiffs take the position that any service issues somehow remain legitimately outstanding, we believe it would benefit the parties and the Court if these issues are resolved promptly, including to continue to facilitate consistent deadlines for whatever defendants are actually parties to the case.

BOIES SCHILLER FLEXNER LLP

BSF

Respectfully submitted,

/s/ Eric Brenner

Eric Brenner

cc: All counsel by ECF
